# UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF WISCONSIN

In re:

Wisconsin & Milwaukee Hotel LLC,

Case No. 24-21743-gmh Chapter 11

Debtor.

# MAY 2024 FEE STATEMENT OF RICHMAN & RICHMAN LLC AS COUNSEL TO DEBTOR

Applicant:	Richman & Richman LLC
Counsel for:	Wisconsin & Milwaukee Hotel LLC
Period for compensation and reimbursement:	May 1, 2024 through May 31, 2024
Amount of compensation sought as actual, reasonable, and necessary:	\$71,032.00
Amount of reimbursement expenses sought as actual, reasonable, and necessary:	\$180.65
Total interim approval requested:	\$71,212.65

Dated this 10th day of June 2024.

### RICHMAN & RICHMAN Attorneys for the Debtor

By: /s/ Michael P. Richman

Michael P. Richman Claire Ann Richman Eliza M. Reyes

122 W Washington Ave, Suite 850

Madison, WI 53703 Tel: (608) 630-899 Fax: (608) 630-8991 mrichman@RandR.law crichman@RandR.law ereyes@RandR.law

## Richman & Richman LLC

**INVOICE** 

Date: 06/10/2024

Invoice #876

122 W Washington Ave, Suite 850 Madison, WI 53703-2732

Wisconsin & Milwaukee Hotel LLC c/o Jackson Street Management LLC Attn: Mr. Edward G. Carow 731 N. Jackson Street, Suite 420, Milwaukee WI53202

### Wisconsin & Milwaukee Hotel LLC/-2024.00023

## **Chapter 11**

#### **Services**

Туре	Date	Notes	Timekeeper	Quantity	Rate	Total
Service	05/01/2024	1104 - DIP Financing / Cash Collateral: Review emails from F. DiCastri re open cc issues and prep of related email to C. Brown for WL re same (.5); further email to F. DiCastri re positions on open issues (.3); additional emails w/F. DiCastri, C. Brown and client team re status of open issues and negotiations (.1); additional emails and t/c w/C. Brown re same (.2); revise and comprehensive review of draft final cash collateral order (.6); further work on cc order edits (.2); further emails w/F. DiCastri re adequate protection of non-cash collateral in cc order (.2)	MPR	2.10	\$750.00	\$1,575.00
Service	05/01/2024	1102 - Case Administration / US Trustee: Emails w/J. Cordova re bank account issues (.1); t/conf w/V. Owens of East West bank re DIP account and correspondent bank relationship (.1)	MPR	0.20	\$750.00	\$150.00
Service	05/01/2024	1102 - Case Administration / US Trustee: phone conference with J Rabinowitz to discuss DIP accounts (.4); exchange emails with J Rabinowitz regarding terms of same (.3)	CAR	0.70	\$575.00	\$402.50
Service	05/01/2024	1104 - DIP Financing / Cash Collateral: Continue with preparations to finalize Agreed Order for Final Use of Cash Collateral, including reviewing emails from counsel for Computershare regarding terms of same, and emails to counsel for White Lodging requesting budget and	EMR	0.30	\$450.00	\$135.00

Service         05/01/2024         1103 - Petition, Schedules & Financials: Continue working on WMH's schedules and statements.         EMR         1.00         \$450.00         \$450.00           Service         05/02/2024         1104 - DIP Financing / Cash Collateral: Review, revise and finalize Agreed Order for Use of Cash Collateral (40); finalize exhibits to attach to Agreed Order (40).         EMR         0.80         \$450.00         \$360.00           Service         05/02/2024         1103 - Petition, Schedules & Financials: EMR         5.50         \$450.00         \$2,475.00           Service         05/02/2024         1102 - Case Administration / US Trustee: Further emails prep to client team and UST re bank account status (2)         MPR         0.20         \$750.00         \$150.00           Service         05/02/2024         1103 - Petition, Schedules & Financials: Emails to client and WL team re info needed for schedules completion         MPR         0.20         \$750.00         \$150.00           Service         05/02/2024         1104 - DIP Financing / Cash Collateral: Work on final edits to colordragreement and hearing schedule (2); review final co order prefiling and further emails re same (.5)         MPR         0.90         \$750.00         \$39.00           Service         05/02/2024         1106 - Misc Motions & Court Hearings: Service with preparation of exhibits to proposed final order on cash collateral: work on sharing with DIP account through Epiq prepared and maching with DIP account th							
Service   05/02/2024   1104 - DIP Financing / Cash Collateral: Review, revise and finalize Agreed Order for Use of Cash Collateral (A0); finalize sexhibits to attach to Agreed Order (A0).    Service   05/02/2024   1103 - Petition, Schedules & Financials: Prepare schedules and statements.			projections.				
Review, revise and finalize Agreed Order for Use of Cash Collateral (40); finalize exhibits to attach to Agreed Order (40).  Service 05/02/2024 1103 - Petition, Schedules & Financials: Prepare schedules and statements.  Service 05/02/2024 1102 - Case Administration / US Trustee: Prepare schedules and statements.  Service 05/02/2024 1103 - Petition, Schedules & Financials: Prepare schedules and statements.  Service 05/02/2024 1103 - Petition, Schedules & Financials: Prepare schedules & Financials: Emails to cilent and WL team re info needed for schedules completion  Service 05/02/2024 1104 - DIP Financing / Cash Collateral: Work on final edits to co-order/agreement and related emails (4); prep of letter to Court re ca agreement and hearing schedule (.2); review final cc order pre-fling and further emails re same (.5)  Service 05/02/2024 1106 - Misc Motions & Court Hearings: Review and assist with preparation of exhibits to proposed final order on cash collateral motion  Service 05/02/2024 1102 - Case Administration / US Trustee: exchange emails and review proposal for banking with DIP account through Epiq banking with DIP account through Epiq Prep of emails to client and WL teams re entry of co-order and cancellation of hearing  Service 05/03/2024 1102 - Case Administration / US Trustee: Prep of emails to client and WL teams re final orders on interim relief and next steps  Service 05/03/2024 1102 - Case Administration / US Trustee: Prep of emails to client and WL teams re final orders on interim relief and next steps  Service 05/03/2024 1102 - Case Administration / US Trustee: Prep of emails to client and WL teams re final orders on interim relief and next steps  Service 05/03/2024 1103 - Petition, Schedules & Financials: Review file and docket to determine status of all proposed and final orders, pending orders and motions  Service 05/03/2024 1103 - Petiton, Schedules & Financials: DTF 0.30 \$195.00 \$58.50	Service	05/01/2024	Continue working on WMH's schedules and	EMR	1.00	\$450.00	\$450.00
Service 05/02/2024 1102 - Case Administration / US Trustee: Further emails prep to client team and UST re bank account status (.2)  Service 05/02/2024 1103 - Petition, Schedules & Financials: Emails to client and WL team re info needed for schedules completion  Service 05/02/2024 1104 - DIP Financing / Cash Collateral: Work on final edits to cc order/agreement and related emails (.4); prep of letter to Court re cc agreement and hearing schedule (.2); review final co order prefiling and further emails re same (.5)  Service 05/02/2024 1106 - Misc Motions & Court Hearings: Review and assist with preparation of exhibits to proposed final order on cash collateral motion  Service 05/02/2024 1102 - Case Administration / US Trustee: exchange emails and review proposal for banking with DIP account through Epiq entry of co order and cancellation of hearing service or order and cancellation of hearing service or order and cancellation of hearing orders on interim relief and next steps  Service 05/03/2024 1102 - Case Administration / US Trustee: Prep of emails to client and WL teams re entry of cc order and cancellation of hearing orders on interim relief and next steps  Service 05/03/2024 1102 - Case Administration / US Trustee: Prep of emails to client and WL teams re final orders on interim relief and next steps  Service 05/03/2024 1102 - Case Administration / US Trustee: Prep of emails to client and WL teams re final orders on interim relief and next steps  Service 05/03/2024 1103 - Petition, Schedules & Financials: Review documents from client for details and information in support of finalizing bankruptcy schedules	Service	05/02/2024	Review, revise and finalize Agreed Order for Use of Cash Collateral (.40); finalize	EMR	0.80	\$450.00	\$360.00
Further emails prep to client team and UST re bank account status (2)  Service 05/02/2024 1103 - Petition, Schedules & Financials: Emails to client and WL team re info needed for schedules completion  Service 05/02/2024 1104 - DIP Financing / Cash Collateral: Work on final edits to cc order/agreement and related emails (.4); prep of letter to Court re cc agreement and hearing schedule (.2); review final cc order prefling and further emails re same (.5)  Service 05/02/2024 1106 - Misc Motions & Court Hearings: Review and assist with preparation of exhibits to proposed final order on cash collateral motion  Service 05/02/2024 1102 - Case Administration / US Trustee: exchange emails and review proposal for banking with DIP account through Epiq  Service 05/03/2024 1104 - DIP Financing / Cash Collateral: Prep of emails to client and WL teams re riny of cc order and cancellation of hearing  Service 05/03/2024 1102 - Case Administration / US Trustee: Prep of emails to client and WL teams re final orders on interim relief and next steps  Service 05/03/2024 1102 - Case Administration / US Trustee: Prep of emails to client and WL teams re final orders on interim relief and next steps  Service 05/03/2024 1106 - Misc Motions & Court Hearings: Review file and docket to determine status of all proposed and final orders, pending orders and motions  Service 05/03/2024 1103 - Petition, Schedules & Financials: Review documents from client for details and information in support of finalizing bankruptcy schedules	Service	05/02/2024	•	EMR	5.50	\$450.00	\$2,475.00
Emails to client and WL team re info needed for schedules completion  Service 05/02/2024 1104 - DIP Financing / Cash Collateral: Work on final edits to cc order/agreement and related emails (.4); prep of letter to Court re cc agreement and hearing schedule (.2); review final cc order prefiling and further emails re same (.5)  Service 05/02/2024 1106 - Misc Motions & Court Hearings: Review and assist with preparation of exhibits to proposed final order on cash collateral motion  Service 05/02/2024 1102 - Case Administration / US Trustee: exchange emails and review proposal for banking with DIP account through Epiq  Service 05/03/2024 1104 - DIP Financing / Cash Collateral: Prep of emails to client and WL teams re entry of cc order and cancellation of hearing  Service 05/03/2024 1102 - Case Administration / US Trustee: Prep of emails to client and WL teams re entry of cc order and cancellation of hearing  Service 05/03/2024 1102 - Case Administration / US Trustee: Prep of emails to client and WL teams re final orders on interim relief and next steps  Service 05/03/2024 1102 - Case Administration / US Trustee: Prep of emails to client and WL teams re final orders on interim relief and next steps  Service 05/03/2024 1106 - Misc Motions & Court Hearings: Review file and docket to determine status of all proposed and final orders, pending orders and motions  Service 05/03/2024 1103 - Petition, Schedules & Financials: Review documents from client for details and information in support of finalizing bankruptcy schedules	Service	05/02/2024	Further emails prep to client team and UST	MPR	0.20	\$750.00	\$150.00
Work on final edits to cc order/agreement and related emails (.4); prep of letter to Court re cc agreement and nearing schedule (.2); review final cc order prefiling and further emails re same (.5)  Service 05/02/2024 1106 - Misc Motions & Court Hearings: Review and assist with preparation of exhibits to proposed final order on cash collateral motion  Service 05/02/2024 1102 - Case Administration / US Trustee: exchange emails and review proposal for banking with DIP account through Epiq  Service 05/03/2024 1104 - DIP Financing / Cash Collateral: Prep of emails to client and WL teams reentry of cc order and cancellation of hearing  Service 05/03/2024 1102 - Case Administration / US Trustee: Prep of emails to client and WL teams refinal orders on interim relief and next steps  Service 05/03/2024 1102 - Case Administration / US Trustee: Prep of emails to client and WL teams refinal orders on interim relief and next steps  Service 05/03/2024 1106 - Misc Motions & Court Hearings: Review file and docket to determine status of all proposed and final orders, pending orders and motions  Service 05/03/2024 1103 - Petition, Schedules & Financials: Review documents from client for details and information in support of finalizing bankruptcy schedules	Service	05/02/2024	Emails to client and WL team re info	MPR	0.20	\$750.00	\$150.00
Review and assist with preparation of exhibits to proposed final order on cash collateral motion  Service 05/02/2024 1102 - Case Administration / US Trustee: exchange emails and review proposal for banking with DIP account through Epiq  Service 05/03/2024 1104 - DIP Financing / Cash Collateral: Prep of emails to client and WL teams reentry of cc order and cancellation of hearing  Service 05/03/2024 1102 - Case Administration / US Trustee: MPR 0.20 \$750.00 \$150.00 Prep of emails to client and WL teams refinal orders on interim relief and next steps  Service 05/03/2024 1106 - Misc Motions & Court Hearings: Review file and docket to determine status of all proposed and final orders, pending orders and motions  Service 05/03/2024 1103 - Petition, Schedules & Financials: Review documents from client for details and information in support of finalizing bankruptcy schedules	Service	05/02/2024	Work on final edits to cc order/agreement and related emails (.4); prep of letter to Court re cc agreement and hearing schedule (.2); review final cc order pre-	MPR	0.90	\$750.00	\$675.00
exchange emails and review proposal for banking with DIP account through Epiq  Service 05/03/2024 1104 - DIP Financing / Cash Collateral: Prep of emails to client and WL teams reentry of cc order and cancellation of hearing  Service 05/03/2024 1102 - Case Administration / US Trustee: Prep of emails to client and WL teams refinal orders on interim relief and next steps  Service 05/03/2024 1106 - Misc Motions & Court Hearings: Review file and docket to determine status of all proposed and final orders, pending orders and motions  Service 05/03/2024 1103 - Petition, Schedules & Financials: Review documents from client for details and information in support of finalizing bankruptcy schedules	Service	05/02/2024	Review and assist with preparation of exhibits to proposed final order on cash	DTF	0.20	\$195.00	\$39.00
Prep of emails to client and WL teams re entry of cc order and cancellation of hearing  Service 05/03/2024 1102 - Case Administration / US Trustee: MPR 0.20 \$750.00 \$150.00 Prep of emails to client and WL teams re final orders on interim relief and next steps  Service 05/03/2024 1106 - Misc Motions & Court Hearings: Review file and docket to determine status of all proposed and final orders, pending orders and motions  Service 05/03/2024 1103 - Petition, Schedules & Financials: Review documents from client for details and information in support of finalizing bankruptcy schedules	Service	05/02/2024	exchange emails and review proposal for	CAR	0.30	\$575.00	\$172.50
Prep of emails to client and WL teams re final orders on interim relief and next steps  Service 05/03/2024 1106 - Misc Motions & Court Hearings: Review file and docket to determine status of all proposed and final orders, pending orders and motions  Service 05/03/2024 1103 - Petition, Schedules & Financials: Review documents from client for details and information in support of finalizing bankruptcy schedules	Service	05/03/2024	Prep of emails to client and WL teams re entry of cc order and cancellation of	MPR	0.20	\$750.00	\$150.00
Review file and docket to determine status of all proposed and final orders, pending orders and motions  Service 05/03/2024 1103 - Petition, Schedules & Financials: DTF 0.30 \$195.00 \$58.50 Review documents from client for details and information in support of finalizing bankruptcy schedules	Service	05/03/2024	Prep of emails to client and WL teams re	MPR	0.20	\$750.00	\$150.00
Review documents from client for details and information in support of finalizing bankruptcy schedules	Service	05/03/2024	Review file and docket to determine status of all proposed and final orders, pending	DTF	0.20	\$195.00	\$39.00
Service 05/03/2024 1103 - Petition, Schedules & Financials: EMR 6.20 \$450.00 \$2,790.00	Service	05/03/2024	Review documents from client for details and information in support of finalizing	DTF	0.30	\$195.00	\$58.50
	Service	05/03/2024	1103 - Petition, Schedules & Financials:	EMR	6.20	\$450.00	\$2,790.00

		Continue preparing schedules and statements 5.0); prepare attachments to schedules and statements to be included in filing (.8); prepare email to stakeholders forwarding drafts of statements and schedules for review and requesting additional needed information to complete same (.4).				
Service	05/06/2024	1103 - Petition, Schedules & Financials: review schedules regarding licenses, including phone conference with J. Cordova regarding same (.3); leave phone message and prepare email to M. Flaherty regarding same (.1)	CAR	0.40	\$575.00	\$230.00
Service	05/06/2024	1102 - Case Administration / US Trustee: phone conference with J. Rabinowitz regarding banking fees with Epiq and need for cash account sweeps (,4); review emails to coordinate DIP accounts (.1)	CAR	0.50	\$575.00	\$287.50
Service	05/06/2024	1103 - Petition, Schedules & Financials: Continue preparing and revising Schedules and Statements to finalize same.	EMR	5.80	\$450.00	\$2,610.00
Service	05/06/2024	1102 - Case Administration / US Trustee: Emails to WL and debtor teams re bank account opening info and process (.4); emails to V. Morelli and J. Rabinowitz re same (.1); further work facilitating setup of DIP bank accounts, including emails to client team and WL for further info (.2)	MPR	0.70	\$750.00	\$525.00
Service	05/06/2024	1103 - Petition, Schedules & Financials: work on schedules/declaration and related info emails (.3); prep of additional emails to client and WL teams re info needed to complete schedules and related issues (.4)	MPR	0.70	\$750.00	\$525.00
Service	05/07/2024	1106 - Misc Motions & Court Hearings: Prepare draft motion to establish deadline to file proofs of claim, notice of deadline to file proofs of claim, and proposed order	DTF	2.50	\$195.00	\$487.50
Service	05/07/2024	1112 - Debtor Meetings & Communications: phone conference with MPR, M Flaherty, R Erkert, and J Cordova to prepare for 341 meeting and review schedules	CAR	0.90	\$575.00	\$517.50
Service	05/07/2024	1102 - Case Administration / US Trustee: telephone mtg among M. Flaherty, R. Eckart, J. Cordova and C. Richman re preps for 341 mtg	MPR	0.90	\$750.00	\$675.00
Service	05/07/2024	1103 - Petition, Schedules & Financials:	EMR	0.50	\$450.00	\$225.00

		Finalize Supplemental Creditor Matrix.				
Service	05/08/2024	1103 - Petition, Schedules & Financials: Redact extensive information including guest names from exhibits to bankruptcy schedules in support of preparing redaction motion and amended bankruptcy schedules	DTF	1.50	\$195.00	\$292.50
Service	05/08/2024	1106 - Misc Motions & Court Hearings: Draft motion and proposed order to restrict public access and redact re: exhibits to bankruptcy schedules and prepare for filing	DTF	1.60	\$195.00	\$312.00
Service	05/08/2024	1102 - Case Administration / US Trustee: represent client at 341 meeting (.9), non-working lunch (1.0 not included), conference with client representatives to prepare for 341 meeting and post 341 meeting strategy and issues discussions, including phone conference with Attormey L Steele regarding redactions and conference with client regarding same (2.2); review and respond to emails regrading cash and pleadings for payments (.4); review and revise Motion to Redact Schedules for filing (.4)	CAR	3.90	\$575.00	\$2,242.50
Service	05/08/2024	015 - Non-working Travel Time: travel to Milwaukee to meet with client for 341 meeting	CAR	1.70	\$575.00	\$977.50
Service	05/08/2024	014 -Travel time to: Madison from Milwaukee working, including phone conference with Attorney DN regarding hotel FA recommendations; review lists of pleadings to be prepared and schedule amendments to be made; discuss need for motions to file for payments to be made for various debts; discuss cash management with hotel manager; prepare email to have account information sent to Attorney L Steele	CAR	1.70	\$575.00	\$977.50
Service	05/08/2024	1106 - Misc Motions & Court Hearings: Revise and update motion to establish deadline to file proofs of claim	DTF	0.50	\$195.00	\$97.50
Service	05/08/2024	015 - Non-working Travel Time: Travel to Milwaukee w/C. Richman for 341 mtg and client mtgs (billed at half rate)	MPR	1.70	\$375.00	\$637.50
Service	05/08/2024	1102 - Case Administration / US Trustee: Mtg w/C. Richman, R. Eckart, J. Cordova and M. Flaherty re 341 pre-meeting preps (.5); participate in 341 meeting (.9); post-341 mtg strategy discussions and	MPR	4.80	\$750.00	\$3,600.00

		mtgs among same group on all pending issues (1.7); working travel back to Madison on same (1.7)				
Service	05/08/2024	1108 - Employment, Billing & Compensation: Prep of emails seeking bids from financial advisor candidates (.9)	MPR	0.90	\$750.00	\$675.00
Service	05/08/2024	1106 - Misc Motions & Court Hearings: Emails w/C. Brown re potential motions for payment of liquor vendor and temp employment agency	MPR	0.50	\$750.00	\$375.00
Service	05/08/2024	1110 - Claim Management Issues: Phone conference with Attorney Christopher Lambert, counsel for Town Bank, regarding Town Bank's unsecured claim and claims bar date.	EMR	0.30	\$450.00	\$135.00
Service	05/08/2024	1108 - Employment, Billing & Compensation: Prepare draft of motion for alternative compensation procedures for professionals employed in Chapter 11 case.	EMR	1.20	\$450.00	\$540.00
Service	05/08/2024	1110 - Claim Management Issues: Office conference with DTF to discuss preparation of and bases for motion to establish claims bar date.	EMR	0.40	\$450.00	\$180.00
Service	05/08/2024	1106 - Misc Motions & Court Hearings: Begin legal research on treatment of real estate taxes assessed prepetition to determine relief to request to pay same.	EMR	0.80	\$450.00	\$360.00
Service	05/08/2024	1103 - Petition, Schedules & Financials: Assist with preparing motion to redact certain information on attachment to chapter 11 schedules.	EMR	0.80	\$450.00	\$360.00
Service	05/09/2024	1106 - Misc Motions & Court Hearings: Review order on Debtor's Motion with Respect to Utility Service and prepare same for service on all utility entities pursuant to order	DTF	0.50	\$195.00	\$97.50
Service	05/09/2024	1102 - Case Administration / US Trustee: Email exchange with client re: Chapter 11 operating instructions and notice of additional insured and UST for notice to insurance company	DTF	0.20	\$195.00	\$39.00
Service	05/09/2024	1106 - Misc Motions & Court Hearings: Review, revise, and update motion for entry of order to establish claims bar date	DTF	0.60	\$195.00	\$117.00
Service	05/09/2024	1104 - DIP Financing / Cash Collateral:	MPR	0.30	\$750.00	\$225.00

		Prep of email to F. DiCastri re adequate protection payment; and related emails to C. Brown and client team				
Service	05/09/2024	1102 - Case Administration / US Trustee: Prep of bank account management email to C. Brown, including budget and notice issues (.5); further emails to Debtor and WL teams re DIP account opening matters (.2)	MPR	0.70	\$750.00	\$525.00
Service	05/09/2024	1108 - Employment, Billing & Compensation: Continue preparing motion for alternative compensation procedures for Debtor's professionals.	EMR	0.80	\$450.00	\$360.00
Service	05/09/2024	1106 - Misc Motions & Court Hearings: Begin preparing motion for authority to pay prepetition real estate taxes.	EMR	0.30	\$450.00	\$135.00
Service	05/10/2024	1106 - Misc Motions & Court Hearings: Revise and update draft motion to establish claims bar date with form notice and proposed order	DTF	0.40	\$195.00	\$78.00
Service	05/10/2024	1104 - DIP Financing / Cash Collateral: Various emails among client and WL team re April budget reconciliations and cash collateral	MPR	0.20	\$750.00	\$150.00
Service	05/10/2024	1108 - Employment, Billing & Compensation: Further emails re FA candidate qualifications	MPR	0.20	\$750.00	\$150.00
Service	05/11/2024	1108 - Employment, Billing & Compensation: T/conf /D. Friedland (Eisner Amper) re bid for FA work (.1) t/conf w/A. Tantlief (FTI) re bid for FA work (.1)	MPR	0.20	\$750.00	\$150.00
Service	05/11/2024	1104 - DIP Financing / Cash Collateral: Further email w/WL team re April budget reconciliation as it affects adequate protection payment	MPR	0.10	\$750.00	\$75.00
Service	05/13/2024	1106 - Misc Motions & Court Hearings: Revise and update draft motion and proposed order to set deadline for proofs of claim	DTF	0.50	\$195.00	\$97.50
Service	05/13/2024	1112 - Debtor Meetings & Communications: Prep of email to client team and agenda for strategy call (.4); video strategy call w/client (.7)	MPR	1.10	\$750.00	\$825.00
Service	05/13/2024	1102 - Case Administration / US Trustee: emails re status of bank accounts w/C. Brown (.4); related t/cs re same and MORs	MPR	1.30	\$750.00	\$975.00

		and financial reporting w/B. Schieve and C. Brown (.7); emails w/White Lodging team re MOR info and process (.2)				
Service	05/13/2024	1106 - Misc Motions & Court Hearings: Work on bar date motion (.2); work on alternative comp motion (.2); work on property tax payment motion (.2)	MPR	0.60	\$750.00	\$450.00
Service	05/13/2024	1108 - Employment, Billing & Compensation: Continue working on motion for alternative compensation procedures.	EMR	0.70	\$450.00	\$315.00
Service	05/14/2024	1109 - Asset Analysis & Recovery: Review loan documents and draft loan abstracts	KAH	3.10	\$195.00	\$604.50
Service	05/14/2024	1106 - Misc Motions & Court Hearings: Prepare revisions to draft motion to set deadline to file proofs of claim, form notice of need to file proofs of claim, and proposed order	DTF	1.40	\$195.00	\$273.00
Service	05/14/2024	1103 - Petition, Schedules & Financials: Review client documents to determine receipt of certificates of insurance	DTF	0.20	\$195.00	\$39.00
Service	05/14/2024	1106 - Misc Motions & Court Hearings: Further work on alternative comp motion (.1); further work on bar date motion (.1); further work on property tax payment motion and related motion to shorten notice (.3)	MPR	0.60	\$750.00	\$450.00
Service	05/14/2024	1108 - Employment, Billing & Compensation: review financial advisor proposals and prep of related email to client team (.5); prep of emails to FA candidates re initial decisions and interview schedule (.5); followup emails to FA candidates re interview scheduling and info needed (.2)	MPR	1.20	\$750.00	\$900.00
Service	05/14/2024	1104 - DIP Financing / Cash Collateral: Emails w/WL and WMH teams re April reconciliations to determine Lender adequate protection payment (.2); prep of email to F. DiCastri re status of adequate protection payment (.1)	MPR	0.30	\$750.00	\$225.00
Service	05/14/2024	1106 - Misc Motions & Court Hearings: Draft, revise, and finalize Debtor's Motion for Authority to Pay Prepetition Real and Personal Property Taxes, Motion to Shorten Notice on Tax Motion, and Exhibits for Tax Motion.	EMR	3.40	\$450.00	\$1,530.00

Service	05/14/2024	1108 - Employment, Billing & Compensation: Continue revising Motion for Alternative Compensation Procedures.	EMR	0.50	\$450.00	\$225.00
Service	05/15/2024	1109 - Asset Analysis & Recovery: Review loan documents and draft loan document abstracts	КАН	3.00	\$195.00	\$585.00
Service	05/15/2024	1106 - Misc Motions & Court Hearings: Review docket text order re: motion authorizing payment of prepetition taxes and motion to shorten notice, and prepare notice of motion pursuant to court's order	DTF	0.70	\$195.00	\$136.50
Service	05/15/2024	1106 - Misc Motions & Court Hearings: Prepare motion for order establishing procedures for interim compensation and reimbursement with notice and proposed order for court filing and service on creditors	DTF	0.70	\$195.00	\$136.50
Service	05/15/2024	1106 - Misc Motions & Court Hearings: Review court's docket text order and prepare notice for order authorizing payment of prepetition real estate and personal property taxes for court filing and service of notice and underlying motion on creditors	DTF	0.40	\$195.00	\$78.00
Service	05/15/2024	1106 - Misc Motions & Court Hearings: Review court's order on proof of claims deadline with approved form of notice and prepare same for service on creditors	DTF	0.30	\$195.00	\$58.50
Service	05/15/2024	1104 - DIP Financing / Cash Collateral: Review April cash flow and reconciliations from WL for calc of adequate protection payment (.3); work on adeq protection payment calculations and email to client team w/recommendations re same (.5); prep of related emails and review replies on adequate protection status to F. DiCastri and WL Team (.6)	MPR	1.40	\$750.00	\$1,050.00
Service	05/15/2024	1106 - Misc Motions & Court Hearings: Review Court's Docket Text Order granting Motion to Shorten Notice on Motion for Authority to Pay Prepetition Real and Personal Property Taxes (.2); prepare Notice of Motion on Motion for Authority to Pay Prepetition Real and Personal Property Taxes accordingly (.4).	EMR	0.60	\$450.00	\$270.00
Service	05/15/2024	1108 - Employment, Billing & Compensation: Prepare final revisions to Motion for Alternative Compensation Procedures (.5); prepare Notice of Motion	EMR	1.20	\$450.00	\$540.00

		for Alternative Compensation Procedures (.3); and prepare proposed Order granting Motion.				
Service	05/15/2024	1102 - Case Administration / US Trustee: Phone call and email exchanges with Jennifer Cordova to obtain Certificate of Property Insurance and Certificate of Liability Insurance to provide to counsel for Computershare (.3); receive and review Certificate of Liability Insurance from Jennifer Cordova and email same to Attorney Frank DiCastri (.1); followup email exchange with Jennifer Cordova to obtain Certificate of Property Insurance (.1).	EMR	0.50	\$450.00	\$225.00
Service	05/16/2024	1106 - Misc Motions & Court Hearings: Prepare all proofs of service for motion for order authorizing payment of prepetition real estate taxes, motion and proposed order establishing procedures for interim compensation and reimbursement, and order on proofs of claim deadline for entry on court docket	DTF	0.40	\$195.00	\$78.00
Service	05/16/2024	1104 - DIP Financing / Cash Collateral: Followup emails on status of adequate protection payment (.2)	MPR	0.20	\$750.00	\$150.00
Service	05/16/2024	1102 - Case Administration / US Trustee: Emails re DIP account process understandings w/WL	MPR	0.20	\$750.00	\$150.00
Service	05/16/2024	1108 - Employment, Billing & Compensation: Emails re FA interview schedule	MPR	0.20	\$750.00	\$150.00
Service	05/16/2024	1106 - Misc Motions & Court Hearings: Research applicable Wisconsin Statutes and informational materials from the Wisconsin Department of Revenue regarding liquor licensing and restrictions on retail sale and purchase of alcohol from wholesalers to prepare motion for authority to pay prepetition invoices.	EMR	1.50	\$450.00	\$675.00
Service	05/16/2024	1106 - Misc Motions & Court Hearings: Prepare motion for authority to pay prepetition liquor invoices.	EMR	2.50	\$450.00	\$1,125.00
Service	05/17/2024	1109 - Asset Analysis & Recovery: Review loan documents and draft loan abstracts	KAH	2.50	\$195.00	\$487.50
Service	05/17/2024	1104 - DIP Financing / Cash Collateral: Prep of email to F. DiCastri contesting Lender calculation of adequate protection payment, and related emails to client team	MPR	0.60	\$750.00	\$450.00

		(.6)				
Service	05/17/2024	1102 - Case Administration / US Trustee: Prep of email to J. Cordova re pending financial reporting and bank account matters (.1); prep of email to WL team re management of joint account authorities, and t/c w/C. Brown re same (.2)	MPR	0.30	\$750.00	\$225.00
Service	05/17/2024	1110 - Claim Management Issues: Conduct email exchange with counsel for Town Bank to advise of status of debtor's proposed chapter 11 plan.	EMR	0.20	\$450.00	\$90.00
Service	05/17/2024	1102 - Case Administration / US Trustee: Conduct email exchange with Jennifer Cordova to request Certificate of Property Insurance to provide to counsel for Computershare.	EMR	0.20	\$450.00	\$90.00
Service	05/17/2024	1106 - Misc Motions & Court Hearings: Prepare revisions to Motion for Authority to Pay Prepetition Liquor Invoices to include request for authority to pay prepetition invoices owed to temp agency.	EMR	1.80	\$450.00	\$810.00
Service	05/17/2024	1106 - Misc Motions & Court Hearings: Conduct analysis on invoice for contribution to World Music Festival (Summerfest) to determine whether to request authority to pay same.	EMR	0.50	\$450.00	\$225.00
Service	05/20/2024	1108 - Employment, Billing & Compensation: Zoom interviews of FA candidates w/client team (.8); related zoom mtgs w/client team to review qualifications (.4); emails w/L. Steele re alternative compensation motion and potential settlement (.5)	MPR	1.70	\$750.00	\$1,275.00
Service	05/20/2024	1102 - Case Administration / US Trustee: emails to WL team re MOR and bank account status and info needed (.1)	MPR	0.10	\$750.00	\$75.00
Service	05/20/2024	1106 - Misc Motions & Court Hearings: Work on motion to pay prepetition liquor vendor and temp employment agency invoices (.2)	MPR	0.20	\$750.00	\$150.00
Service	05/20/2024	1104 - DIP Financing / Cash Collateral: email exchanges w/J. Cordova re payment of Summerfest sponsor fees (.2); review draft loan doc abstracts from K. Holmes (.2)	MPR	0.40	\$750.00	\$300.00
Service	05/20/2024	1106 - Misc Motions & Court Hearings: Review agreement with World Music	EMR	0.40	\$450.00	\$180.00

		Festival (Summerfest) to confirm contract not with Debtor to confirm no request for relief necessary by Debtor to pay 2024 contribution.				
Service	05/20/2024	1106 - Misc Motions & Court Hearings: Continue preparing and revising motion for authority to pay prepetition liquor invoices and temp agency invoices.	EMR	2.40	\$450.00	\$1,080.00
Service	05/21/2024	1102 - Case Administration / US Trustee: Review email from UST's office re: request for updated liability insurance certificates, gather the requested information from client via email, and respond via email with attached documentation	DTF	0.40	\$195.00	\$78.00
Service	05/21/2024	1113 - Executory Contracts: Review Management Agreement and draft memorandum re management duties	KAH	1.20	\$195.00	\$234.00
Service	05/21/2024	1108 - Employment, Billing & Compensation: Further emails w/L. Steele re settlement of potential obj to alternative comp motion (.2)	MPR	0.20	\$750.00	\$150.00
Service	05/21/2024	1102 - Case Administration / US Trustee: Further emails to WL team and C. Brown re MOR completion, and email to WMH team re same (.3)	MPR	0.20	\$750.00	\$150.00
Service	05/21/2024	1108 - Employment, Billing & Compensation: Prep of emails to FA candidates re interview process (.2)	MPR	0.20	\$750.00	\$150.00
Service	05/21/2024	1106 - Misc Motions & Court Hearings: Further work on motion to pay prepetition liquor vendor and temp employment agency	MPR	0.50	\$750.00	\$375.00
Service	05/21/2024	1102 - Case Administration / US Trustee: Receive updated certificates of Property and Liability Insurance from Jennifer Cordova (.1); prepare email to Frank DiCastri forwarding same (.1).	EMR	0.20	\$450.00	\$90.00
Service	05/21/2024	1106 - Misc Motions & Court Hearings: Continue revising motion to pay prepetition liquor invoices and temp agency invoices (2.0); prepare revisions to declaration of Ben Risseuw in support of motion (.8); prepare email to Attorney Neal Brown requesting clarification regarding liquor invoices and temp agency (.2)	EMR	3.00	\$450.00	\$1,350.00
Service	05/21/2024	1108 - Employment, Billing & Compensation: Review emails regarding	EMR	0.20	\$450.00	\$90.00

		employment of Mallery SC as special counsel to continue property tax appeal to begin preparing application.				
Service	05/22/2024	1102 - Case Administration / US Trustee: Review WL management agreement provisions re assistance w/ch. 11 duties of WMH (.2); t/conf w/J. Cordova re MOL status and issues, and emails w/WL team re info still needed (.3); review email from C. Brown and WL re MOR and other financial info furnishing, and prep of reply (.9); zoom mtg w/client team re all pending matters w/ch. 11 case and strategies (.6); t/conf w/J. Rabinowitz re DIP account wire fees (.1)	MPR	2.10	\$750.00	\$1,575.00
Service	05/22/2024	1105 - Plan & Disclosures: Review F. DiCastri demand letter for info related to commission of hotel appraisal; and prep of draft reply (.7)	MPR	0.70	\$750.00	\$525.00
Service	05/22/2024	1106 - Misc Motions & Court Hearings: Emails re status of liquor vendor invoices	MPR	0.10	\$750.00	\$75.00
Service	05/22/2024	1108 - Employment, Billing & Compensation: Emails w/D. Friedland re employment app and mtg schedule	MPR	0.10	\$750.00	\$75.00
Service	05/22/2024	1106 - Misc Motions & Court Hearings: Phone conference with Attorney Neal Brown to obtain details on liquor invoices and temp agency invoices (.3); review liquor invoice (.1); review cancellation letter from temp agency (.1).	EMR	0.30	\$450.00	\$135.00
Service	05/22/2024	1106 - Misc Motions & Court Hearings: Revise motion for authority to pay prepetition invoices to temp agency, declaration of Ben Risseeuw, notice of motion, and proposed order.	EMR	2.30	\$450.00	\$1,035.00
Service	05/22/2024	1103 - Petition, Schedules & Financials: Review financial information to assist with preparation of monthly operating reports.	EMR	0.30	\$450.00	\$135.00
Service	05/23/2024	1108 - Employment, Billing & Compensation: prepare application for employment of Mallery S.C.	КАН	2.80	\$195.00	\$546.00
Service	05/23/2024	1104 - DIP Financing / Cash Collateral: Emails w/N. Brown re qs about payment of invoices for workers comp claims (.2)	MPR	0.20	\$750.00	\$150.00
Service	05/23/2024	1106 - Misc Motions & Court Hearings: Work on motion to pay temp agency invoices (.4)	MPR	0.40	\$750.00	\$300.00

Service	05/23/2024	1102 - Case Administration / US Trustee: T/conf w/C. Brown re various management agreement and financial info furnishing issues between WMH and WL (.5); and related email report to WMH team (.2)	MPR	0.70	\$750.00	\$525.00
Service	05/23/2024	1105 - Plan & Disclosures: Further work on proposed reply to F. DiCastri demand for info in connection with appraisal of hotel	MPR	0.30	\$750.00	\$225.00
Service	05/23/2024	1106 - Misc Motions & Court Hearings: Continue preparing revisions to motion to pay temp agency invoices.	EMR	2.50	\$450.00	\$1,125.00
Service	05/23/2024	1108 - Employment, Billing & Compensation: Begin drafting application to employ EA Advisory Group LLC as financial advisor to debtor.	EMR	0.80	\$450.00	\$360.00
Service	05/23/2024	1108 - Employment, Billing & Compensation: Draft application to employ Mallery SC as special counsel to the Debtor.	EMR	1.50	\$450.00	\$675.00
Service	05/23/2024	1108 - Employment, Billing & Compensation: Review and begin revising application to employ Allen & Associates as appraiser for the Debtor.	EMR	0.40	\$450.00	\$180.00
Service	05/24/2024	1108 - Employment, Billing & Compensation: Prepare revise application to employ appraiser	KAH	2.10	\$195.00	\$409.50
Service	05/24/2024	1106 - Misc Motions & Court Hearings: Continue preparing revisions to motion for authority to pay prepetition temp agency invoices.	EMR	1.80	\$450.00	\$810.00
Service	05/24/2024	1108 - Employment, Billing & Compensation: Continue preparing application to employ Mallery SC as special counsel for the Debtor (.2); prepare email to Attorney Christopher Strohbehn at Mallery with information to conduct conflict check (.2).	EMR	2.20	\$450.00	\$990.00
Service	05/24/2024	1108 - Employment, Billing & Compensation: Prepare email to Deborah Friedland at Eisner Advisory Group, LLC providing information for conflict check for declaration in support of application to employ firm as debtor's financial advisor.	EMR	0.20	\$450.00	\$90.00
Service	05/24/2024	1108 - Employment, Billing & Compensation: Prepare email to Laurence Allen sending information to run conflict check for declaration in support of	EMR	1.50	\$450.00	\$675.00

		application to employ Allen & Associates as appraiser (.2); continue preparing application to employ Allen & Associates (.8); receive and review email from Laurence Allen confirming conflict check clear (.1); prepare Declaration of Laurence Allen in support of employment application (.4).				
Service	05/24/2024	1108 - Employment, Billing & Compensation: Review Eisner Advisory Group engagement letter and prep of email to D. Friedland re same (.2); work on Mallery retention app (.3)	MPR	0.50	\$750.00	\$375.00
Service	05/24/2024	1104 - DIP Financing / Cash Collateral: Review DiCastri email re adequate protection payment and prep of comments to WMH team re same	MPR	0.10	\$750.00	\$75.00
Service	05/24/2024	1110 - Claim Management Issues: T/conf w/IRS rep re questions about hotel management and employees	MPR	0.10	\$750.00	\$75.00
Service	05/28/2024	1108 - Employment, Billing & Compensation: Prepare further revisions to application to employ Allen & Associates and Declaration of Laurence G. Allen in support of same (1.0); prepare further revisions to application to employ Mallery SC (.8)	EMR	1.80	\$450.00	\$810.00
Service	05/28/2024	1106 - Misc Motions & Court Hearings: Review order on motion to pay real estate and property taxes	MPR	0.10	\$750.00	\$75.00
Service	05/28/2024	1102 - Case Administration / US Trustee: Emails w/WL and client re status of MORs, and w/C. Brown, counsel to WL	MPR	0.10	\$750.00	\$75.00
Service	05/28/2024	1108 - Employment, Billing & Compensation: Review/revise L. Allen dec in support of Allen appraiser engagement (.2); work on Mallery engagement app (.2)	MPR	0.40	\$750.00	\$300.00
Service	05/29/2024	1108 - Employment, Billing & Compensation: Phone conference with Debbie Friedland to confirm results of conflict search for Declaration in Support of Application to Employ EA Group (.2); Continue preparing Application to Employ EA Group as Financial Advisor to Debtor (.7); Prepare draft Declaration of Deborah Friedland (.5).	EMR	1.40	\$450.00	\$630.00
Service	05/29/2024	1112 - Debtor Meetings & Communications: Prep of agenda for	MPR	1.50	\$750.00	\$1,125.00

		weekly client team status/strategy meeting (.2); status/strategy meeting via Zoom w/ client team (.8); prep of email report to client team re call w/F. DiCastri on appraisal discovery (.4); prep of report/ comments to client team re Anten email seeking acquisition (.1)				
Service	05/29/2024	1102 - Case Administration / US Trustee: Review info requests from FPP and email w/J. Cordova re same	MPR	0.10	\$750.00	\$75.00
Service	05/29/2024	1104 - DIP Financing / Cash Collateral: t/ conf w/F. DiCastri re appraisal info demands and adquate protection issues	MPR	0.50	\$750.00	\$375.00
Service	05/30/2024	1106 - Misc Motions & Court Hearings: Call and email exchange with L. Allen re: declaration for executed signature and preparation of same in support of notice and application for authority to retain and employ Allen & Associates as Appraiser	DTF	0.30	\$195.00	\$58.50
Service	05/30/2024	1108 - Employment, Billing & Compensation: Prepare further revisions to Application to Employ Eisner Amper Advisory Group, LLC (1.0); prepare further revisions to Declaration of Deborah Friedland in support of Application (.8).	EMR	1.80	\$450.00	\$810.00
Service	05/30/2024	1108 - Employment, Billing & Compensation: Prepare further revisions to Application to Employ Allen & Associates as appraiser (.5); prepare further revisions to Declaration of Laurence G. Allen (.4); Prepare exhibits to Application (;2); prepare email to Laurence Allen sending Application, Declaration, and Exhibits for his review and approval and receive email from Laurence Allen approving Application (.2); phone conference with Laurence Allen to arrange for signing of Declaration (.2).	EMR	1.50	\$450.00	\$675.00
Service	05/30/2024	1108 - Employment, Billing & Compensation: Prepare further revisions to Application to Employ Mallery SC and Declaration of Christopher Strohben (.8) phone call with, and emails to Christopher Strohbehn to obtain and clarify information for Strohben Declaration (.6).	EMR	1.40	\$450.00	\$630.00
Service	05/30/2024	1108 - Employment, Billing & Compensation: Further work on Mallery and Allen engagement apps and decs (.5); work on Eisner Adv Group app and dec (.5); further review of edits to Allen engagement and dec (.1); further work on	MPR	1.40	\$750.00	\$1,050.00

		Eisner Adv Group app and dec (.3)				
Service	05/30/2024	1109 - Asset Analysis & Recovery: Prep of email reply to DiCastri information requests for Lender appraisal	MPR	0.30	\$750.00	\$225.00
Service	05/30/2024	1102 - Case Administration / US Trustee: Prep of email to C. Brown and client team re orders on the payment of taxes and WL cooperation issues	MPR	0.20	\$750.00	\$150.00
Service	05/31/2024	1103 - Petition, Schedules & Financials: Retrieve and review hotel management agreement, franchise agreement, and guaranty for attorney review and prepare same for attorney review in support of preparing information and documentation for monthly operating reports	DTF	0.60	\$195.00	\$117.00
Service	05/31/2024	1106 - Misc Motions & Court Hearings: Assist in preparation of applications to employ appraiser and financial advisor filings with declarations	DTF	0.50	\$195.00	\$97.50
Service	05/31/2024	1108 - Employment, Billing & Compensation: Review revised EA Advisory Group engagement agreement as financial advisor to the Debtor (.2); Prepare additional revisions to Application to Employ EA Advisory Group and Declaration of Deborah Friedland to finalize same (2.3);	EMR	2.50	\$450.00	\$1,125.00
Service	05/31/2024	1102 - Case Administration / US Trustee: Prep of email to C. Brown re utility threat to hotel phone service (.1); related emails w/ WL re utilities and tax payments (.1); review utilities order and prep of email re threat by phone service provider Granite (.2)	MPR	0.50	\$750.00	\$375.00
Service	05/31/2024	1105 - Plan & Disclosures: Review management agreement and related agreements, and prep of email report to client re issues on assessment of WL relationship	MPR	1.00	\$750.00	\$750.00
Service	05/31/2024	1108 - Employment, Billing & Compensation: Further review of Eisner Adv Group edits to employment app and prep of email re same	MPR	0.10	\$750.00	\$75.00
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**Quantity Subtotal** 147.3 Services Subtotal \$71,032.00

#### **Expenses**

Type	Date	Notes	Quantity	Rate	Total
Expense	05/07/2024	Filing fee for creditor matrix	1.00	\$34.00	\$34.00
Expense	05/08/2024	Mileage: Roundtrip mileage for Attorney Michael Richman and Attorney Claire Ann Richman to attend the 341 Meeting at the US Bankruptcy Court, 517 E. Wisconsin Ave., Milwaukee, WI	156.20	\$0.67	\$104.65
Expense	05/08/2024	Parking: Parking expense at the US Bankruptcy Court, Milwaukee, WI	1.00	\$14.00	\$14.00
Expense	05/09/2024	Filing fee for Motion to Redact	1.00	\$28.00	\$28.00

Expenses Subtotal \$180.65

Time Keeper	Position	Quantity	Rate	Total
Kayla Holmes	Associate	14.7	\$195.00	\$2,866.50
Eliza Reyes	Associate	68.7	\$450.00	\$30,915.00
Claire Richman	Partner	10.1	\$575.00	\$5,807.50
Michael Richman	Partner	37.2	\$750.00	\$27,900.00
Michael Richman	Partner	1.7	\$375.00	\$637.50
David Fowle	Paralegal	14.9	\$195.00	\$2,905.50

 Quantity Total
 147.3

 Subtotal
 \$71,212.65

 Total
 \$71,212.65

### **Statement of Account**

Outstanding Balance New Charges Payments Received **Total Amount Outstanding**( \$81,406.60 + \$71,212.65 ) - ( \$0.00 ) = **\$152,619.25** 

#### Richman & Richman LLC Trust - Advanced Fees

Date Type Notes Matter Receipts Payments Balance		Date	Type	Notes	Matter	Receipts	Payments	Balance
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	Richman & Ricl	hman LLC Trust - Advanced	Fees Balance	\$31.826.00	
	invoice #724	Hotel LLC/-2024.00023			
04/09/2024	Payment for	Wisconsin & Milwaukee	\$16,174.00		\$31,826.00
04/09/2024		Wisconsin & Milwaukee Hotel LLC/-2024.00023		\$23,000.00	\$48,000.00
04/06/2024	Advance Fee Deposit	Wisconsin & Milwaukee Hotel LLC/-2024.00023		\$25,000.00	\$25,000.00

ALL BILLS DUE & PAYABLE UPON RECEIPT UNLESS ARRANGEMENTS ARE MADE WITH COUNSEL.

Please make all amounts payable to: Richman & Richman LLC

Check/Cash Payments: Mail to 122 W. Washington Ave., Suite 850, Madison, WI 53703-2732

Credit Card Payments: Via LawPay at www.RandR.law (or attached link)

Wire Instructions: Account Name: Richman & Richman LLC (General Checking)

Account Address: 122 W. Washington Ave., Suite 850, Madison, WI 53703-2732

Bank Name and Address: BMO Harris Bank

ABA: 071025661 SWIFT Code HATRUS44 Acct No. 4838178298

Please pay within 30 days.